

**From:** Peter Protopapas <pdp@rplegalgroup.com>  
**Sent:** Thursday, December 5, 2019 9:21 AM  
**To:** Lee, Harry <HLee@steptoe.com>  
**Cc:** jspitz@rplegal.com; Lindsay Valek <Lindsay@rplegalgroup.com>; wdavis@brblegal.com  
**Subject:** RE: USF&G v. Southern insulation

Dear Mr. Lee

Thank you for your email and we are in the process of retaining lawyers for representation.

We should have everyone in place by Monday.

Thank you for your patience.

Peter

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**From:** Lee, Harry [<mailto:HLee@steptoe.com>]  
**Sent:** Wednesday, December 04, 2019 3:53 PM  
**To:** Peter Protopapas <pdp@rplegalgroup.com>  
**Cc:** [jspitz@rplegal.com](mailto:jspitz@rplegal.com); Lindsay Valek <Lindsay@rplegalgroup.com>; wdavis@brblegal.com  
**Subject:** RE: USF&G v. Southern insulation

Dear Mr. Protopapas:

On November 19, 2019, I spoke with Jescelyn Spitz of your office about a 21-day extension your office requested on behalf of Southern Insulation, Inc. to prepare an Answer to the Complaint filed by USF&G in the above-captioned federal insurance coverage case. On behalf of USF&G, Bill Davis and I agreed to the requested extension, but as part of the conversation I asked Ms. Spitz for dates on which counsel from your office could meet to conduct the conference required by Rule 26(f). That same day, Ms. Spitz thanked me via email for agreeing to a 21-day extension of Southern Insulation's Answer to the above referenced matter (see email below), and also confirmed that your office would follow up regarding a Rule 26(f) conference date.

It has been more than two weeks and we have not heard from your office concerning a Rule 26(f) conference date. In the interim, and without any advance notice, your office prepared and sent us an insurance-related third-party subpoena in connection with *Charles T. Hopper, et al. vs. Air Liquid Systems Corp., et al.*, Civil Action No. 2019-CP-40-00076 (Richland County Court of Common Pleas, SC), an asbestos-related bodily injury case pending in state court. The subpoena seeks a massive amount of information relating to Southern Insulation, even though USF&G is not a party to that case. USF&G contends the subpoena is improper and will lodge objections.

Regardless, we again ask that you provide us with dates on which you can confer pursuant to Rule 26(f). As you know, the parties are required by the Federal Rules to conduct the conference "as soon as practicable."

-- Harry Lee

**Harry Lee**  
Partner  
Global Insurance/Reinsurance Practice Group Leader  
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## Steptoe

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**From:** Jescelyn Spitz <[ispitz@rplegalgroup.com](mailto:ispitz@rplegalgroup.com)>  
**Sent:** Tuesday, November 19, 2019 4:16 PM  
**To:** Lee, Harry <[HLee@steptoe.com](mailto:HLee@steptoe.com)>  
**Cc:** Peter Protopapas <[pdp@rplegalgroup.com](mailto:pdp@rplegalgroup.com)>; Lindsay Valek <[Lindsay@rplegalgroup.com](mailto:Lindsay@rplegalgroup.com)>; [wdavis@brblegal.com](mailto:wdavis@brblegal.com)  
**Subject:** USF&G v. Southern insulation

Mr. Lee:

Thank you for agreeing to a 21 day extension of Southern Insulation's Answer to the above referenced matter.

As discussed, we will follow up with you regarding a 26f conference.

Best regards,

Jes

Jescelyn Tillman Spitz, Esq.  
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